

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
)
)
)
Plaintiff,) CRIMINAL NO. 20-30153-SPM
)
)
vs.)
)
LARRY W. HALE,)
)
)
Defendant.)

STIPULATION OF FACTS

The parties hereby stipulate that, if this case had proceeded to trial, the Government would have proven the following beyond a reasonable doubt:

1. From on or about February 12, 2020, until on or about July 3, 2020, Defendant Larry W. Hale, a 51 year old man, lived at 412 Mitchell Lane, Belleville, Illinois, 62223, in the Southern District of Illinois, with E.P., a 16 year old minor female, who he had brought to live with him in Illinois from Georgia in February 2020 for the purpose of engaging in criminal sexual activity for which he could have been charged with a criminal offense, that is, Aggravated Criminal Sexual Abuse, in violation of 720 ILCS 5/11-1.60(d). By traveling from Georgia to Illinois, the defendant transported E.P. in interstate commerce. At the time, E.P. was 16 years old.

2. On or about February 15, 2020, the defendant employed, used, persuaded, induced and enticed E.P. to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct using his Apple iPhone 11.

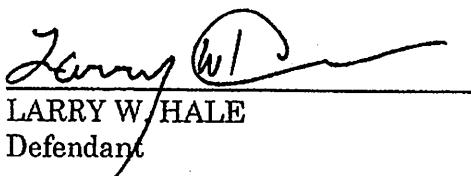
At the time, E.P. was 16 years old. The visual depiction was created on and by the Apple iPhone 11 which was manufactured using parts that were made from outside the state of Illinois. As such, the visual depiction was produced using materials that had been mailed, shipped or transported across state lines or in foreign commerce.

3. In a voluntary, videotaped statement, the defendant admitted that E.P. had lived at the Mitchell Lane residence with him since approximately Valentine's Day 2020. He said that he had met E.P., who was from Georgia, on an online dating site approximately a year prior, and that he knew she was 16 when he went to Georgia to pick her up to bring her to Illinois. He also admitted that there was a video of E.P. engaging in a sex act on his Apple iPhone 11. He also indicated that the sexual relationship with E.P. began a week or two after she moved into the Mitchell Lane residence.

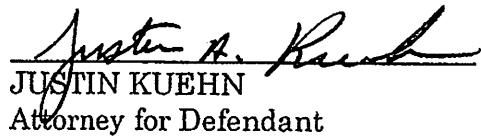
4. In a child advocacy interview, E.P., who had admitted at the residence on the day of Hale's arrest that she was 16, stated that she met Hale on an online dating site approximately a year prior. She said that Hale picked her up in Georgia in February 2020 and brought her to Illinois. She said that she and Hale lived in the basement of the residence on Mitchell Lane while Hale's sister-in-law and nephew lived upstairs. She said that she first had sexual contact with Hale right after coming to Illinois, and that they had sex once or twice a week.

5. This stipulation of facts is intended only to provide the Court with a sufficient foundation to accept the defendant's guilty plea and is not necessarily an exhaustive account of the defendant's criminal activity.

SO STIPULATED:



LARRY W. HALE
Defendant



JUSTIN KUEHN
Attorney for Defendant

Date: 9/13/2022

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Date: 2022.09.11 18:52:30
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ANGELA SCOTT
Assistant United States Attorney

Date: 9/11/2022